

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: KAREN M. STROW

: NO. 19-13546-MDC

: CHAPTER 13

Response to Motion for Relief filed by Lakeview Loan Servicing LLC

Debtor, by and through her attorney, responds as follows:

1-5. Admitted.

6-11. Denied. Debtor fell behind as a result of the financial impact created by Covid 19 and received a forbearance from creditor. Debtor can become current in a relatively short period of time. Movant is adequately protected and the real estate is necessary for a successful reorganization.

WHEREFORE, it is respectfully requested that the Motion be DENIED.

By: /S/Michael P. Kelly